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April 24, 2020

VIA ECF

The Honorable Pamela K. Chen
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Hernan Lopez*, Case No. 15-cr-252-32 (PKC)

Dear Judge Chen:

We represent Defendant Hernan Lopez in the above-captioned case pending before this Court. Through this letter, we request modification of Attachment B to the Court's order setting bond conditions (the "Bond Order"). The government consents to this request. The requested modification is to amend the Bond Order to provide that fully executed deeds of trust will be delivered to the title agent by April 29, 2020, and that the title agent will deliver the deeds of trust by hand to the relevant Recorders' offices as soon as those offices reopen, with certified proof of official recording to be filed with the Court by May 27, 2020. The Bond Order currently requires proof of mailing to the relevant Recorders' offices be filed by April 29, 2020, with certified proof of official recording to be filed with the Court by May 27, 2020.

On April 20, 2020, this Court issued the Bond Order as to Defendant Hernan Lopez. (*See* Dkt. 1374.) Attachment B to the Bond Order requires that Mr. Lopez's bond be secured by Real Property—deeds of trust in favor of the Clerk, U.S. District Court, Eastern District of New York, for three properties. (*Id.*) The Court also ordered that the executed deeds of trust and proof of mailing to the Recorder's office be filed by April 29, 2020, and certified proof of official recording filed by May 27, 2020. (*Id.*)

On April 23, 2020, the agents handling execution of the relevant deeds of trust for Mr. Lopez's bond informed counsel for Mr. Lopez that the Los Angeles Recorder is experiencing lengthy delays in processing recordings received via mail, and recommended avoiding such delay by recording the deeds in person when the Recorder's office reopens.

Accordingly, Mr. Lopez requests modification of the Bond Order to provide that fully executed deeds of trust will be delivered to the title agent by April 29, 2020, and that the title agent will deliver the deeds of trust by hand to the relevant Recorders' offices as soon as those offices



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reopen, with certified proof of official recording to be filed with the Court by May 27, 2020. In compliance with the Court's practices and procedures, this written submission is being filed on ECF.

Sincerely,

Matthew D. Umhofer
James W. Spertus
Samuel A. Josephs
Counsel for Hernan Lopez

cc: Counsel of record (by ECF)